

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT TACOMA

EAGLE HARBOR HOLDINGS, LLC, and  
MEDIUSTECH, LLC,

Plaintiffs,

v.

FORD MOTOR COMPANY,

Defendant.

Case No. 3:11-cv-05503-BHS

**DECLARATION OF ALEXANDRA  
AMRHEIN IN SUPPORT OF  
DEFENDANT FORD MOTOR  
COMPANY'S EXPEDITED JOINT  
DISCOVERY MOTION PURSUANT  
TO LCR 37 TO COMPEL  
ADDITIONAL DEPOSITION TIME  
WITH THE NAMED INVENTORS OF  
THE ASSERTED PATENTS**

I, Alexandra Amrhein, declare as follows:

1. I am a Senior Associate at the law firm Wilmer Cutler Pickering Hale and Dorr LLP, 60 State Street, Boston, Massachusetts 02109. I am one of the attorneys responsible for the representation of Defendant Ford Motor Company ("Ford") in the above-captioned matter.

2. I submit this declaration in support of Ford's Expedited Joint Discovery Motion Pursuant to LCR 37 to Compel Additional Deposition Time with the Named Inventors of the Asserted Patents, which is filed herewith.

3. Attached to this declaration as *Exhibit 1* is a true and correct copy of an excerpt from the November 19, 2013 Deposition of Brian Hewitt.

4. Attached to this declaration as *Exhibit 2* is a true and correct copy of an email exchange between Alexandra Amrhein, counsel for Ford, and Genevieve Vose Wallace, counsel for Plaintiffs, dated December 17, 2013.

1           5.       Attached to this declaration as **Exhibit 3** is a true and correct copy of an excerpt  
2 from Volume I of the Deposition of Dan Preston, dated December 19, 2013.

3           6.       Attached to this declaration as **Exhibit 4** is a true and correct copy of Ford's  
4 Notice of 30(b)(6) Deposition to Plaintiffs, dated July 19, 2013.

5           7.       Attached to this declaration as **Exhibit 5** is a true and correct copy of an email  
6 from Alexandra Amrhein, counsel for Ford, to Plaintiffs' counsel, dated December 21, 2012,  
7 and attachments thereto.

8           8.       Attached to this declaration as **Exhibit 6** is a true and correct copy of an email  
9 exchange between Floyd Short, counsel for Plaintiffs, and Sarah Petty, counsel for Ford, dated  
10 March 29, 2013 and April 1, 2013.

11          9.       Attached to this declaration as **Exhibit 7** is a true and correct copy of an email  
12 from Floyd Short, counsel for Plaintiffs, to Todd Zubler, counsel for Ford, dated July 19, 2013.

13          10.      Attached to this declaration as **Exhibit 8** is a true and correct copy of an email  
14 from Todd Zubler, counsel for Ford, to Floyd Short, counsel for Plaintiffs, dated July 20, 2013.

15          11.      Attached to this declaration as **Exhibit 9** is a true and correct copy of an email  
16 from Alexandra Amrhein, counsel for Ford, to Plaintiffs' counsel, dated December 9, 2013.

17          12.      Attached to this declaration as **Exhibit 10** is a true and correct copy of an email  
18 from Jordan Connors, counsel for Plaintiffs, to Ford's counsel, dated December 10, 2013.

19          13.      Attached to this declaration as **Exhibit 11** is a true and correct copy of an email  
20 from Leslie Pearlson, counsel for Ford, to Jordan Connors, counsel for Plaintiffs, dated  
21 December 11, 2013.

22          14.      Attached to this declaration as **Exhibit 12** is a true and correct copy of an email  
23 from Alexandra Amrhein, counsel for Ford, to Ian Crosby, counsel for Plaintiffs, dated  
24 December 18, 2013.

25          15.      Attached to this declaration as **Exhibit 13** is a true and correct copy of an  
26 Affidavit of Service of Subpoena to Robert Pierce Lutter, dated August 15, 2013, indicating  
27 that service of Mr. Lutter was accomplished on August 9, 2013.

1           16.     Attached to this declaration as ***Exhibit 14*** is a true and correct copy of an email  
2 from Genevieve Vose Wallace, counsel for Plaintiffs, to Ford's counsel, dated September 10,  
3 2013.

4           17.     Attached to this declaration as ***Exhibit 15*** is a true and correct copy of an email  
5 from Alexandra Amrhein, counsel for Ford, to Genevieve Vose Wallace, counsel for Plaintiffs,  
6 dated September 11, 2013.

7           18.     Attached to this declaration as ***Exhibit 16*** is a true and correct copy of an email  
8 from Alexandra Amrhein, counsel for Ford, to Genevieve Vose Wallace, counsel for Plaintiffs,  
9 dated September 13, 2013.

10          19.     Attached to this declaration as ***Exhibit 17*** is a true and correct copy of an email  
11 from Genevieve Vose Wallace, counsel for Plaintiffs, to Alexandra Amrhein, counsel for Ford,  
12 dated September 12, 2013.

13          20.     Attached to this declaration as ***Exhibit 18*** is a true and correct copy of an email  
14 from Genevieve Vose Wallace, counsel for Plaintiffs, to Leslie Pearlson, counsel for Ford,  
15 dated October 3, 2013.

16          21.     Attached to this declaration as ***Exhibit 19*** is a true and correct copy of an email  
17 from Leslie Pearlson, counsel for Ford, to Genevieve Vose Wallace, counsel for Plaintiffs,  
18 dated October 7, 2013.

19          22.     Attached to this declaration as ***Exhibit 20*** is a true and correct copy of an email  
20 from Genevieve Vose Wallace, counsel for Plaintiffs, to Leslie Pearlson, counsel for Ford,  
21 dated November 25, 2013.

22          23.     Attached to this declaration as ***Exhibit 21*** is a true and correct copy of an email  
23 from Leslie Pearlson, counsel for Ford, to Genevieve Vose Wallace, counsel for Plaintiffs,  
24 dated November 27, 2013.

25          24.     Attached to this declaration as ***Exhibit 22*** is a true and correct copy of an email  
26 from Genevieve Vose Wallace, counsel for Plaintiffs, to Sarah Petty, counsel for Ford, dated  
27 January 6, 2014.

1           25.     Attached to this declaration as ***Exhibit 23*** is a true and correct copy of an email  
2 exchange between Genevieve Vose Wallace, counsel for Plaintiffs, and Sarah Petty, counsel for  
3 Ford, dated January 8, 2014.

4           26.     Attached to this declaration as ***Exhibit 24*** is a true and correct copy of an email  
5 from Alexandra Amrhein, counsel for Ford, to Jordan Connors, counsel for Plaintiffs, dated  
6 January 9, 2014.

7           27.     Attached to this declaration as ***Exhibit 25*** is a true and correct copy of excerpts  
8 from Volume II of the Deposition of Dan Preston, dated December 20, 2013.

9           28.     Attached to this declaration as ***Exhibit 26*** is a true and correct copy of an email  
10 from Sarah Petty, counsel for Ford, to Genevieve Vose Wallace, counsel for Plaintiffs, dated  
11 January 17, 2014.

12           29.     Attached to this declaration as ***Exhibit 27*** is a true and correct copy of an  
13 excerpt from the rough transcript of the Deposition of Tracey Olson, dated January 17, 2014.

14           30.     Attached to this declaration as ***Exhibit 28*** is a true and correct copy of an email  
15 from Lindsay Calkins, counsel for Plaintiffs, to Todd Zubler and Alexandra Amrhein, counsel  
16 for Ford, dated January 24, 2014.

17  
18 Executed on this 24th day of January, 2014.  
19  
20

21                               /s/ Alexandra Amrhein  
22                               Alexandra Amrhein  
23  
24  
25  
26  
27

**CERTIFICATE OF SERVICE**

I certify that this pleading was filed electronically with the Court and thus served simultaneously upon all counsel of record, this 24th day of January, 2014.

/s/ Duncan E. Manville  
Duncan E. Manville